

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

DRIPS HOLDINGS, LLC,

Plaintiff,

vs.

TELED RIP LLC, f/k/a DRIPS.IO, et al.,

Defendants.

CASE NO.: 5:19-CV-02789

JUDGE JOHN R. ADAMS

MAGISTRATE JUDGE CARMEN E.
HENDERSON

March 29, 2021 JOINT STATUS REPORT

Plaintiff-Counterdefendant Drips Holdings, LLC (“Drips Holdings”) and Defendant-Counterclaimant Teledrip, LLC, by and through their undersigned counsel, respectfully submit this Joint Status Report pursuant to the Court’s November 20, 2020 Amended Scheduling Order (DE 66).

Current State of Discovery

The parties have exchanged several sets of written discovery and have produced documents. Two non-party depositions have been taken by Drips. The parties have both issued a number of documents subpoenas to non-parties and are working with those non-parties to help them in the document production process. The parties also are in the process of working with the

large number of non-party fact witnesses to secure their depositions, which has created scheduling difficulties. Drips has noticed the depositions of Teledrip and its key employees for May 4-7, 2021 in Orange County, California. Teledrip intends to object to in-person depositions until such a time as its clients have been vaccinated against Covid-19. Both parties have objections to the other's designation of documents Attorney's Eyes Only, which may complicate deposition scheduling.

Motions

Defendant Taylor Murray filed a motion to dismiss the Third Amended Complaint on December 4, 2020. Plaintiff Drips Holdings filed a Motion for a Protective Order on March 12, 2021 and an Appeal of the Emergency Motion for a Protective Order on March 17, 2021. All of these motions are pending.

Settlement Status

Defendants presented Plaintiff with a Settlement Offer on March 9, 2021. Plaintiff has not yet replied to this Offer.

Dated: March 29, 2021

Respectfully submitted,

/s/Christina J. Moser

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record in this case via the Court's Electronic Filing System.

/s/Christina J. Moser

Counsel for Plaintiff